

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

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No. 4:23-cr-00346

ANDREW VENEGAS

UNOPPOSED MOTION FOR CONTINUANCE AND RESET ALL DEADLINES

TO THE HONORABLE JUDGE KENNETH M. HOYT:

COMES NOW, Andrew Venegas, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The case is currently scheduled for Sentencing on September 16, 2025.
3. The Defendant is working in cooperation with the United States Government and needs additional time.
4. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the Sentencing and all other deadlines for 90 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

PAUL DOYLE & ASSOCIATES, P.C.

By: /s/ Paul Doyle
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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of August 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle
Paul Doyle
Attorney for Andrew Venegas

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 19th day of August 2025, Luis Batarse, Assistant United States Attorney, stating he was unopposed to this motion.

/s/ Trevor Sharon
Paul Doyle
Attorney for Andrew Venegas